

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Chapter 7</b>
<b>Mubarak H. Ibrahim,</b>	)	<b>Bankruptcy No. 23-07031</b>
<b>Debtor.</b>	)	
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<b>Erika Spyropoulos et. al.</b>	)	<b>Hon. Jacqueline P. Cox</b>
<b>Plaintiffs,</b>	)	<b>Adversary No. 23-00393</b>
<b>v.</b>	)	<b>Hearing Date: 11/19/24</b>
<b>Mubarak H. Ibrahim</b>	)	<b>Hearing Time: 1:30 P.M.</b>
<b>Defendant</b>	)	

**NOTICE OF MOTION**

TO: Ariel W. Weissberg by email transmission at [ariel@weissberglaw.com](mailto:ariel@weissberglaw.com)

**PLEASE TAKE NOTICE** that on **November 19, 2024 at 1:30 p.m.** I will appear before the Honorable Judge Jacqueline P. Cox, or any judge sitting in that judge's place, **either** in courtroom 680, of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present "***Defendant's Motion for Partial Summary Judgment on Counts I of Complaint***," a copy of which and a proposed order are attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by Zoom using the internet**, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

**To appear by Zoom using a telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

**Meeting ID and passcode.** The meeting ID for this hearing is 161 273 2896, and the passcode is 778135. The meeting ID and passcode can also be found on the judge's page on the court's web site.

**If you object to this motion** and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may call the matter regardless.

Dated: November 12, 2024

Mubarak H. Ibrahim  
By: /s/ Chester H. Foster, Jr.  
One of his attorneys

Chester H. Foster Jr. Attorney No. 03122632  
Foster Legal Services, PLLC  
16311 Byron Drive  
Orland Park, IL 60462  
Phone: 708-403-3800



### CERTIFICATE OF SERVICE

I, Chester H. Foster, Jr., counsel for the Defendant Mubarak H. Ibrahim, certify that on November 12, 2024, I caused a copy of the attached **Notice of Motion** and “***Defendant’s Motion for Partial Summary Judgment on Counts I of Complaint,***” and a proposed order to be served (i) electronically upon on Plaintiffs’ attorney, Ariel Weissberg by email transmission at [ariel@weissberglaw.com](mailto:ariel@weissberglaw.com) and (ii) electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to each of CM/ECF registered user in this case.

Chester H. Foster Jr. Attorney No. 03122632  
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Phone: 708-403-3800

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**THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>	)	<b>Chapter 11</b>
<b>Mubarak H. Ibrahim,</b>	)	<b>Bankruptcy No. 23-07031</b>
<b>Debtor.</b>	)	
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<b>Erika Spyropoulos et. al.</b>	)	<b>Hon. Jacqueline P. Cox</b>
<b>Plaintiffs,</b>	)	<b>Adversary No. 23-00393</b>
<b>v.</b>	)	<b>Hearing Date: 11/19/24</b>
<b>Mubarak H. Ibrahim</b>	)	<b>Hearing Time: 1:30 P.M.</b>
<b>Defendant</b>	)	

**DEFENDANT'S MOTION FOR PARTIAL  
SUMMARY JUDGMENT ON COUNT I OF COMPLAINT**

Now comes Mubarak H. Ibrahim ("Defendant"), by and through his attorneys, Chester H. Foster, Jr. and Keevan D. Morgan, Pursuant to Fed. R. Bankr. P 7056 and Local Rule 7056-1, and moves for partial summary judgment in his favor with regard to Counts I of Plaintiffs' adversary complaint (the "Complaint") and that said Count be stricken from Plaintiffs' Complaint. In support of his motion, Defendant relies on his memorandum of law, statement of uncontested material facts, and the affidavits and exhibits attached thereto that are being filed with the Court simultaneously with the filing of this motion.

Wherefore, the Defendant requests that that partial summary judgment be granted in favor of Defendant and against Plaintiffs with regard to Counts II and III of Plaintiffs' Complaint, that said Counts be stricken from Plaintiffs' Complaint and for such other and further relief as this Court deems just and proper.

Respectfully submitted,  
Mubarak H. Ibrahim  
By: s/s Chester H. Foster, Jr.  
One of His Attorneys

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